

EXHIBIT C

From: Maerk, Robert (BOP) rmaerk@bop.gov
Subject: Re: SHU - Keith Raniere (57005-177) - Proposed Legal Schedule pending Nov 30th deadline.
Date: November 9, 2023 at 5:06 PM
To: Craig Rothfeld craig@insideoutsideltd.com
Cc: Ashworth, Thomas (BOP) tashworth@bop.gov

I am not able to complete a legal call today for Inmate Raniere due to an emergency situation that is currently in progress in the Special Housing unit. I am off next week but am going to reach out to Counselor Ashworth about getting Inmate Raniere a couple phone calls for next week. Please keep in mind I can not give you an exact amount of time he will be allowed to use the phone but my goal is to at least get him at minimum two one-hour phone calls next week.



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Email: rmaerk@bop.gov

From: Craig Rothfeld <craig@insideoutsideltd.com>
Sent: Thursday, November 9, 2023 11:43 AM
To: Maerk, Robert (BOP) <rmaerk@bop.gov>
Subject: [EXTERNAL] Re: SHU - Keith Raniere (57005-177) - Proposed Legal Schedule pending Nov 30th deadline.

Good morning. Wanted to check in to see if there will be a legal call today so we can mobilize the legal team on our end.

If you've learned any new details on his SHU placement would be grateful for that as well.

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From: Maerk, Robert (BOP) <rmaerk@bop.gov>
Sent: Wednesday, November 8, 2023 5:07 PM
To: Craig Rothfeld <craig@insideoutsideltd.com>
Subject: Re: SHU - Keith Raniere (57005-177) - Proposed Legal Schedule pending Nov 30th deadline.

Regarding why he is in special housing you can direct all question through me, I just don't have the details as of yet due to me not being here when he was placed.



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From: Craig Rothfeld <craig@insideoutsideltd.com>
Sent: Wednesday, November 8, 2023 2:02 PM
To: Maerk, Robert (BOP) <rmaerk@bop.gov>
Cc: Gutierrez, Manuel (BOP) <mgutierrez@bop.gov>; Cook, Clay (BOP) <c2cook@bop.gov>; Joseph Tully <joseph@tully-weiss.com>; Joseph P. Daugherty (Joseph.Daugherty@tully-weiss.com) <Joseph.Daugherty@tully-weiss.com>; Arthur Aidala (aidalaesq@aidalalaw.com) <aidalaesq@aidalalaw.com>
Subject: [EXTERNAL] Re: SHU - Keith Raniere (57005-177) - Proposed Legal Schedule pending Nov 30th deadline.

Thank you for your response below and understood re: schedule post SHU and trying to set up a legal call for tomorrow. If there is a certain time we should keep blocked out as a place holder please let me know.

As for the details on the SHU - who should I direct getting that answer from. Warden Gutierrez or Mr. Cook both who are copied on this email.

We would like to know if he is in there for a) Disciplinary Reasons, b) Administrative Reasons, c) for his own protection due to threats?

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From: Maerk, Robert (BOP) <rmaerk@bop.gov>
Sent: Wednesday, November 8, 2023 2:20 PM
To: Craig Rothfeld <craig@insideoutsideld.com>
Subject: Re: SHU - Keith Raniere (57005-177) - Proposed Legal Schedule pending Nov 30th deadline.

When Inmate Raniere comes out of Special Housing I am able to continue with our planned schedule as previously discussed but while in special housing I need to coordinate with Special housing to get him pulled for phone calls and document drop offs so phone calls may not be as long as I can give him in my office area. I don't want to interfere with his Recreation time and meal time due to him being on lock down majority of the day. As for the reason he is in Special Housing I am not able to elaborate on nor do I have all the details.



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From: Craig Rothfeld <craig@insideoutsideltd.com>
Sent: Wednesday, November 8, 2023 12:08 PM
To: Maerk, Robert (BOP) <rmaerk@bop.gov>
Cc: Gutierrez, Manuel (BOP) <mgutierrez@bop.gov>; Joseph Tully <joseph@tully-weiss.com>; Joseph P. Daugherty (Joseph.Daugherty@tully-weiss.com) <Joseph.Daugherty@tully-weiss.com>; Arthur Aidala (aidalaesq@aidalalaw.com) <aidalaesq@aidalalaw.com>; Cole, Christopher (BOP) <CMCole@bop.gov>
Subject: [EXTERNAL] Re: SHU - Keith Raniere (57005-177) - Proposed Legal Schedule pending Nov 30th deadline.

Good afternoon Mr. Maerk and Warden Gutierrez, and Mr. Cook,

Thank you for the update.

Can you please advise as to why Mr. Raniere is in the SHU? This obviously has created instant grave concern and is also something we will need to liase with the courts about.

With regards to the proposed schedule below I was merely responding to your confirmation to me last week that the facility could accommodate the calls and document drops provided we changed to non-Monday and AM doc drops. So I am not sure what changed but would be grateful for any insight.

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From: Maerk, Robert (BOP) <rmaerk@bop.gov>
Sent: Wednesday, November 8, 2023 1:57:48 PM
To: Craig Rothfeld <craig@insideoutsideltd.com>
Subject: Re: Keith Raniere (57005-177) - Proposed Legal Schedule pending Nov 30th deadline.

Raniere received a 3-hour phone call October 26, 2023, and on November 2, 2023, to a Mr. Daughtery. Inmate Raniere was placed in special housing on Friday November 3, 2023, so this is going to change our originally scheduled dates as I am going to have to coordinate with Special Housing to utilize an office and get him pulled for a phone call. We are again on lockdown at this time, but I am currently working on getting him a call for tomorrow November 9, 2023, not sure about the time yet,





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Email: rmaerk@bop.gov

From: Craig Rothfeld <craig@insideoutsideltd.com>

Sent: Tuesday, November 7, 2023 11:05 AM

To: Maerk, Robert (BOP) <rmaerk@bop.gov>

Cc: Gutierrez, Manuel (BOP) <mgutierrez@bop.gov>; Joseph Tully <joseph@tully-weiss.com>; Joseph P. Daugherty (Joseph.Daugherty@tully-weiss.com) <Joseph.Daugherty@tully-weiss.com>; Gregory Stoltz <greg@gstoltzlaw.com>; Arthur Aidala (aidalaesq@aidalalaw.com) <aidalaesq@aidalalaw.com>

Subject: [EXTERNAL] Re: Keith Raniere (57005-177) - Proposed Legal Schedule pending Nov 30th deadline.

Good morning Mr. Maerk,

I wanted to follow-up on the email below is this revised legal schedule. I understand the facility is off lockdown. I look forward to hearing back from you.

Lost Times

- 4 calls ~ 7.5 hours of legal time with his attorneys
 - No weekly Wed calls (2) from 9/28 - 10/2 due to lockdown
 - Wk. of 10/23 (last week) ~ only one (1) call vs. the 2 scheduled
 - Wk. of 10/30 (this week) ~ only one (1) call vs. the 2 scheduled
- 1 document drop
 - We were not permitted to make our document drop scheduled for this morning (Fri, 11/3)

Proposal / Proposed Legal Calls and Visits aka "Doc Drops"

** I stuck with the days of wk / times you requested I work within **

Tuesday Nov 7, 1-3PM - Call (Joseph Daugherty)

Wednesday Nov 8, 1-3PM - Call (Joseph Daugherty)

Thursday Nov 9, 1-3PM - Call (Joseph Daugherty)

Friday Nov 10, 8-9AM - Visit (Greg Stoltz)

Tuesday Nov 14, 1-3PM - Call (Joseph Daugherty)
Wednesday Nov 15, 1-3PM - Call (Joseph Daugherty)
Thursday Nov 16, 1-3PM - Call (Joseph Daugherty)
Friday Nov 17, 8-9AM - Visit (Greg Stoltz)

Tuesday Nov 21, 1-3PM - Call (Joseph Daugherty)
Wednesday Nov 22, 1-3PM - Call (Joseph Daugherty)
Friday Nov 24, 1-3PM - Visit (Greg Stoltz)

Tuesday Nov 28, 8-9AM - Visit (Arianna Price)
Tuesday Nov 28, 1-3PM - Call (Joseph Daugherty)
Wednesday Nov 29, 1-3PM - Call (Joseph Daugherty)
Thursday Nov 30, 1-3PM - Call (Joseph Daugherty)

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From: Craig Rothfeld
Sent: Friday, November 3, 2023 5:17 PM
To: Robert Maerk (rmaerk@bop.gov) <rmaerk@bop.gov>
Cc: Mark Gutierrez (mgutierrez@bop.gov) <mgutierrez@bop.gov>; Joseph Tully <joseph@tully-weiss.com>; Joseph P. Daugherty (Joseph.Daugherty@tully-weiss.com) <Joseph.Daugherty@tully-weiss.com>; Gregory Stoltz <greg@gstoltzlaw.com>; Arthur Aidala (aidalaesq@aidalalaw.com) <aidalaesq@aidalalaw.com>
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Dear Mr. Maerk,

I started a clean email because some time has passed and I want to make sure we're working off the same dates since the prior requests had dates that have now since passed.

I want to make sure I state this right up front because I mean it and it is important.

I know none of this is your fault and you have been nothing but gracious responsive and professional with me and I appreciate it.

As you know - 2 weeks ago the Judge granted another extension for the Rule 33 Motion (now November 30th) because Mr. Raniere has not been able to get access to his attorneys due to the 2 week lock down and other factors and since that time has now has missed 2 more calls and a document drop.

We do not want to have to ask the Court for another extension which I know can be avoided if we can agree on the schedule below. We have however had to make the court aware of not being able to get the time. Here is what has been lost followed by our proposed schedule to make up for it over the next 4-weeks.

Lost Times

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 - No weekly Wed calls (2) from 9/28 - 10/2 due to lockdown
 - Wk. of 10/23 (last week) ~ only one (1) call vs. the 2 scheduled
 - Wk. of 10/30 (this week) ~ only one (1) call vs. the 2 scheduled
- 1 document drop
 - Were not permitted to make our document drop scheduled for this morning

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Thursday Nov 9, 1-3PM - Call (Joseph Daugherty)
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Tuesday Nov 28, 8-9AM - Visit (Arianna Price)
Tuesday Nov 28, 1-3PM - Call (Joseph Daugherty)
Wednesday Nov 29, 1-3PM - Call (Joseph Daugherty)
Thursday Nov 30, 1-3PM - Call (Joseph Daugherty)

I look forward to hearing back from you and please do not hesitate to reach out to me by phone if that is easier. I regularly correspond with other Unit Teams by phone and am

phone if that is easier. I regularly correspond with other Unit teams by phone and am happy to do so here if it is easier for you.

Have a good weekend.

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